

STATEMENT OF BASIS (AI No. 8514)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0121291 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: S & B Sawmill, L.L.C.
Post Office Box 119
Hineston, Louisiana 71438

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

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DATE PREPARED: July 24, 2006

1. PERMIT STATUS

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

A. LPDES permit: Effective date – Not Applicable
Expiration date – Not Applicable

LPDES Multi-Sector General Permit – (LAR05N716)
Effective date – May 1, 2006
Issuance date – May 6, 2006
Expiration date – April 30, 2011

B. Date Application Received: The permit application for this facility was received on November 21, 2005.

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY – This applicant operates a sawmill plant for the production of hardwood lumber, railroad ties, and wood chips.

B. FEE RATE
a. Fee Rating Facility Type: Minor
b. Complexity Type: II
c. Wastewater Type: III
d. SIC code: 2421

C. LOCATION – 1750 Highway 121 in Hineston, Rapides Parish
(Latitude 31°08' 00", Longitude 92°45' 32")

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- D. Technology Basis – 40 CFR Chapter I, Subchapter N (Effluent Guidelines and Standards) parts 401 and 405 – 471 have been adopted by reference at LAC 33:IX.4903.

Guideline

Sawmills and Planing Mills

Reference

40 CFR Part 429, Subpart K

[NOTE: According to the effluent guidelines, no process wastewater pollutants shall be discharged into navigable waters. The term "process wastewater" specifically excludes utility wastewater under the general provisions cited at 40 CFR 429.11(c). Therefore, for the purpose of this permit, cooling water from the saw blade operation has been deemed as a utility water by BPJ since the cooling water will not contain any additives.]

Other Sources of Technology Based Limits:

Existing Permits with Similar Outfalls

LDEQ Stormwater Guidance [letter dated June 17, 1987, from J. Dale Givens (LDEQ) to Myron Knudson (EPA)]

Best Professional Judgement

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: Discharge of cooling water from the saw blade operation

Treatment: None

Location: At the point of discharge from the northwest side of the plant, adjacent to the saw blade cutting operations, prior to combining with other waters (Latitude 31°08' 00", Longitude 92°45' 32")

Flow: 10,000 GPD

Discharge Route: Unnamed ditch, thence into Hineston Branch, thence into Mill Creek, thence into the Calcasieu River

4. RECEIVING WATERS

STREAM – Unnamed ditch, thence into Hineston Branch, thence into Mill Creek, thence into the Calcasieu River

BASIN AND SEGMENT - Calcasieu River Basin, Subsegment No. 030102

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DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. agriculture
- e. outstanding natural resource waters [The designated use of outstanding natural resource waterbody is limited to the Calcasieu River. In accordance with LAC 33:IX.1111, "designated uses of drinking water supply, oyster propagation and/or outstanding natural resource waters apply only to the waterbodies specifically named in Table 3 (LAC 33:IX.1123) and not to any tributaries and distributaries to such waterbodies which are typically contained in separate subsegments".]

TMDL/303(d) JUSTIFICATION:

Subsegment No. 030102 of the Calcasieu River is listed on the 2004 Final Integrated 303(d) List as impaired for lead. The *Calcasieu River TMDL for Dissolved Lead* was finalized on May 31, 2002. In accordance with this TMDL, there are no known point source discharges of lead in the affected subsegment and natural background loading is the most likely source of lead in this subsegment. Therefore, no reductions from point source discharges is required. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

5. PROPOSED EFFLUENT LIMITS

Outfall 001 – Discharge of cooling water from the saw blade operation

Parameter	Monthly Average	Daily Maximum	Frequency (*1)	Sample Type	Reference
Flow	Report	Report	1/month	Estimate	BPJ; Similar Outfalls
Oil & Grease	---	15	1/month	Grab	BPJ; Similar Outfalls
Visible Sheen (*2)	---	None	1/day	Observation	BPJ; Similar Outfalls
TOC	---	50 mg/L	1/month	Grab	BPJ; Similar Outfalls
pH (s.u.)	6.0 (Min)	9.0 (Max)	1/month	Grab	BPJ; Similar Outfalls

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- (*1) When discharging during normal operating hours.
- (*2) Visual observation shall be made daily and the presence or absence of a sheen recorded. The number of exceedances and the total number of observations shall be reported on a Discharge Monitoring Report (DMR) quarterly.

6. COMPLIANCE

- A. COMPLIANCE ORDER MM-C-04-0107 was issued to S & B Sawmill, L.L.C. on June 6, 2005, for violations identified during the course of the November 2004 inspection. The violations cited were as follows: (1) failure to apply for and obtain permit coverage; (2) failure to prepare and/or implement an adequate Spill Prevention Control Plan; (3) disposition of regulated solid waste without a permit; and (4) unauthorized discharges.

AMENDED COMPLIANCE ORDER MM-C-04-0107 was issued to S & B Sawmill, L.L.C. on March 13, 2006. This action served to amend COMPLIANCE ORDER MM-C-04-0107 to reflect the current status of the facility's operations.

- B. No DMRs could be located in the main files for this facility.
- C. The most recent inspection was performed on August 26, 2005. This follow-up inspection revealed that the facility had not submitted the information required by the compliance action or performed activities to close the unauthorized solid waste dump site and excavate all areas containing visually contaminated soils.

7. ENDANGERED SPECIES

The receiving waterbody, Subsegment No. 030102 of the Calcasieu River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

8. HISTORIC SITES

The discharge is from an existing facility, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of

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Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

9. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

10. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice to be published in:

Local newspaper(s) of general circulation

Office of Environmental Services Public Notice Mailing List